



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**Via First Class Mail and Facsimile (909)328-1803**

**FEB 13 2018**

Paul A. Robinson, Jr., Esq.  
Law Offices of Paul Robinson  
5 North Third Street, Suite 2000  
Memphis, TN 38103

Re: MUR 6861  
Marion Latroy Williams  
National Democratic Party of the U.S.A.,  
Inc.  
Shelby County Democratic Club d/b/a  
Shelby County Democratic Party, Inc.  
Memphis Democratic Club, Inc.  
International Communications Association

Dear Mr. Robinson:

On March 29, 2016 your clients, Marion Latroy Williams, National Democratic Party of the U.S.A., Inc., Shelby County Democratic Club d/b/a Shelby County Democratic Party, Inc., Memphis Democratic Club, Inc., and International Communications Association, were notified that the Federal Election Commission found reason to believe that your clients violated 52 U.S.C. §§ 30104(c) and 30120 of the Federal Election Campaign Act of 1971, as amended ("the Act"), and authorized an investigation of these violations. On May 16, 2016, your clients submitted a response to the Commission's reason to believe findings. After considering the circumstances of the matter, the Commission determined on February 6, 2018, to take no further action as to your clients and closed the file in this matter.

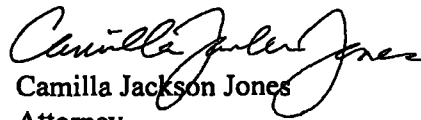
Under the Act and Commission regulations, any "public communication" that "expressly advocates" the election or defeat of a clearly identified candidate must include a disclaimer. 52 U.S.C. § 30120(a); see 11 C.F.R. § 110.11(a)(2). If the communication is not authorized by a candidate or an authorized committee, the disclaimer must clearly state the full name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication and state that the communication was not authorized by any candidate or candidate's committee. 2 U.S.C. § 30120(a)(3); 11 C.F.R. § 110.11(b)(3). Furthermore, if a person other than a political committee makes expenditures that exceed \$250 for these communications, then the person must file an independent-expenditure report with the Commission. 52 U.S.C. § 30104(c). The Commission cautions your clients to take steps to ensure that their conduct is in compliance with the Act and the Commission's Regulations.

Paul Robinson, Esq.  
MUR 6861 (Williams)  
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Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

  
Camilla Jackson Jones  
Attorney

2016-09-01 10:00:00